

1 STATE OF CALIFORNIA }  
2 COUNTY OF LOS ANGELES } ss

3 AFFIDAVIT OF CURTIS HARMON

4 CURTIS HARMON, being duly sworn, deposes and says:

5 1. I have firsthand, personal knowledge of the facts  
6 stated herein, and as to those things stated as based on  
7 information and belief, I believe them to be true; and if called  
8 as a witness, I could and would competently testify thereto.

9 2. On or about September of 1989 I was a member of the Sea  
10 Organization of the Church of Scientology ("the Church") and  
11 specifically the Church of Scientology Western United States  
12 ("CSWUS"). I was assigned the job of "CO PAC Communicator." "CO  
13 PAC Communicator" was the person who assisted the Commanding  
14 Officer ("CO") of the Pacific Area Command ("PAC") which was a  
15 designation for the Church of Scientology facilities located at  
16 1404 N. Catalina, Los Angeles, California. As the CO PAC  
17 Communicator, I handled the communications that came into my  
18 office, and the office of the CO PAC, and I had access to  
19 anything in the Continental Liaison Office, Western United  
20 States, a unit in CSWUS which the CO PAC and I were part of,  
21 which wasn't locked, which included just about everything.

22 3. In early February of 1990, I received a telephone call  
23 from my father, Gary. My father asked me to get some time off  
24 from work to join him for a trip to visit my grandparents and to  
25 go skiing for the weekend.

26 4. I got permission to take time off to take the trip with  
27 my father.

28 5. On the agreed-upon day in early February 1990, my

1 father picked me up to go on the trip. My father drove me to my  
2 grandparents' house in Hemet, California. My father said he had  
3 some friends that wanted to talk to me about Scientology.

4 6. The day after my father and I arrived at my  
5 grandparents' home, Hana and Jerry Whitfield arrived. Over the  
6 course of the next two days, the Whitfields "visited" with me.  
7 This "visiting," which was actually a deprogramming, consisted of  
8 many hours of discussion about their experiences in Scientology  
9 and things that they said that had happened to other people in  
10 regard to Scientology, all of which was negative data that was  
11 not verifiable, for the purpose of trying to convince me to leave  
12 the Church. My father and grandfather also tried to talk me into  
13 leaving Scientology.

14 7. The Whitfields also discussed with me specific people  
15 they had a common cause with in attacking Scientology including  
16 Richard and Vicki Aznaran, the Cult Awareness Network ("CAN"),  
17 Cynthia Kissner (who they told me was the head of CAN), Margery  
18 Wakefield, Bent Corydon and Gerry Armstrong. One of the people  
19 who the Whitfields mentioned they were assisting was David Mayo.  
20 During their conversation with me the Whitfields stated that Mayo  
21 was involved in a lawsuit with the Church concerning OT materials  
22 stolen from the Church. Additionally, the Whitfields had brought  
23 with them stolen Church documents, I specifically recall they  
24 were represented to be OT III and OT VII materials, which the  
25 Whitfields showed me and attempted to denigrate as part of their  
26 efforts to dissuade me from membership in the Church. I knew  
27 that those documents were highly confidential Church scriptures,  
28 and it was therefore obvious that the Whitfields had not obtained

1 them through any legitimate means, and that they must have been  
2 stolen from the Church.

3 8. Based upon statements of my father, he became  
4 acquainted with the Whitfields through a referral from the Cult  
5 Awareness Network, and that he paid the Whitfields approximately  
6 \$4,000 for their "deprogramming" of me.

7 9. On or about the third day of the visit, in early  
8 February 1990, my father, the Whitfields and I drove back to the  
9 Church offices in Los Angeles, known in the Church as the  
10 "Complex." My dad drove. During the drive to Los Angeles, the  
11 Whitfields asked me for current information concerning the  
12 Church. This included who was being declared, any problems the  
13 Church was having, what was being done about those problems. One  
14 of the things I told them about was the Church management's  
15 effort to stop some recently discovered misuse of American  
16 Express (AMEX) cards by some lower Church staff or parishioners  
17 in the Los Angeles area. I told the Whitfields that there had  
18 been a Church Mission sent by the Church of Scientology  
19 International to deal with this, and that the actions and  
20 intentions of that Mission were to stop any and all misuse of  
21 AMEX cards. The Whitfields wanted me to get any documents  
22 relating to our discussions, especially documents about American  
23 Express. We arrived at the Complex about 10:00 or 10:30 p.m.,  
24 and my dad parked the car near the INCOMM offices on Fountain  
25 Avenue.

26 10. My father and the Whitfields waited for me in the car,  
27 while I went into the Complex to retrieve my personal effects and  
28 clothing. I went into my room and picked up my clothes and other

1 possessions. It took me 3 or 4 trips to get my things.

2 11. On the last trip, I went into my office space. I was  
3 looking for my personal things to remove them and I took them. I  
4 took my radio that I found in the CO PAC's office. I was also  
5 looking for the documents that the Whitfields wanted. I wanted  
6 to take documents that would support the things that the  
7 Whitfields were interested in that I told them about. Because I  
8 didn't have time to go through the stack of documents that were  
9 on my desk to look for specific documents of interest, I took the  
10 whole stack. I took documents out of my in-basket, and documents  
11 off of a shelf behind my desk, including documents in a manila  
12 program file. In all, I took about a 5-inch stack of documents  
13 from the office, including recent local Church issues,  
14 dispatches, local Church programs (written issues of specific  
15 actions to take to improve local Los Angeles churches'  
16 administration) and other documents as specified below.

17 12. I took these documents and my personal things back to  
18 the waiting car. I gave the documents to Jerry and Hana and they  
19 stated that they would like to use the documents in court cases  
20 against the Church, but that they couldn't because the documents  
21 were stolen. However, the Whitfields asked me if they could have  
22 some of the documents. I gave them the documents to look at to  
23 see what they were interested in. When I gave them the documents  
24 they told me not to tell anyone in the Church that I had done so.  
25 Then they said they were going to use the documents to help  
26 people who were fighting the Church. My dad turned on the dome  
27 light in the car, while the Whitfields reviewed the documents and  
28 we all drove back to Hemet. They told me to lie and refuse to

1 tell anyone about the deprogramming they had done. They told me  
2 to lie and refuse to admit that I had stolen the documents. They  
3 told me not to tell anyone of my dealings with them.

4 13. I have been shown a group of documents in a folder  
5 designated with the letter "A," which are attached hereto as  
6 Exhibit A. I hereby certify that these documents are, in fact,  
7 copies of some of the documents which I removed from the  
8 possession of CSWUS out of my office and the office of the CO  
9 PAC, without anyone's permission, on that last trip.

10 Exhibit A and folder A documents:

11 28 Oct 89 document, top name is "Cont Finance Dir WUS,"  
12 a 4-page document;

13 26 Oct 89 document, top name is "CFD WUS," a 3-page  
14 document; and

15 December 16, 1989 document entitled: "Non-Existence  
16 Formula," a 2-page document.

17 14. I have been shown a group of documents in a folder  
18 designated with the letter "C," which are attached hereto as  
19 Exhibit C. I hereby certify that these documents are, in fact,  
20 copies of some of the documents which I removed from the  
21 possession of the CSWUS out of my office and the office of the CO  
22 PAC, without anyone's permission, on that last trip.

23 Exhibit C and folder C documents:

24 26 September 1989 document entitled "Executive  
25 Directive, Urgent, PAC BASE BACK TO BASICS PROGRAM,"  
26 10-page document;

27 18 Oct 1989 document entitled "PETITION CSW," 4-page  
28 document;

28 Oct 89 document, top name is "Cont Finance Dir WUS,"  
"re: Legal Bills," 4-page document;

26 Oct 89 document, top name is "CFD WUS," 3-page  
document; and

December 16, 1989 document, entitled "NON-EXISTENCE  
FORMULA ELAINE SIEGEL, SNOW WHITE PGMS CHF OSA US," 2-  
page document.

15. After 2 or 3 days more of visiting with my  
grandparents, I drove to Seattle with my father and moved in with  
him and my step-mother. Approximately 3 to 6 months later, the  
Whitfields called my dad and also spoke to me and requested that  
I give them the rest of the documents that I stole from the  
Church. I agreed to give the Whitfields the rest of the  
documents and my father mailed them from Seattle to the  
Whitfields, who lived in Los Angeles, California.

16. To summarize, the Whitfields convinced me to steal  
documents from the Church, to give the stolen documents to them,  
for their use for the stated purpose of helping people who were  
attacking the Church, including David Mayo to help in his  
lawsuit, Bent Corydon, the Cult Awareness Network, Cynthia

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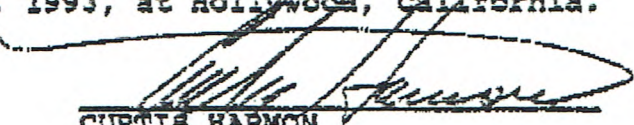
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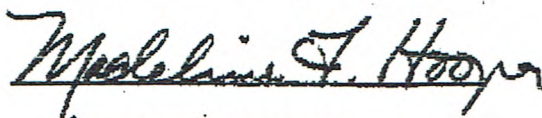
1 Kissar, Vicki and Richard Aznaran, Margery Wakefield and Gerald  
2 Armstrong.

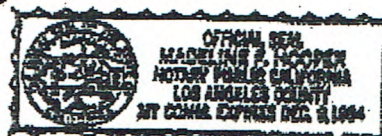
3 I declare, under penalty of perjury, under the laws of the  
4 State of California, that the foregoing is true and correct.

5 Executed on March 14, 1993, at Hollywood, California.

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10 CURTIS HARMON

11 Subscribed and sworn to before me on March 14, 1993.

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RECEIVED  
MAY 10 1993  
HUB LAW OFFICES